



MEMORANDUM

DATE August 23, 1995 5400 1

TO K R Koebel, Waste Regulation Programs, Bldg T130C, X3072

FROM *M.B. Murdock*
M B Murdock, Ecology, Bldg T130B, X3560

SUBJECT WETLANDS TO BE IMPACTED BY PHASE II SEWAGE TREATMENT PLANT
UPGRADE EFFLUENT TANK CONSTRUCTION - MBM - 076 - 95

On August 23, 1995, Ecology personnel evaluated a small seep-fed wetland located at the west end of the Effluent Tank construction location for the Phase III Sewage Treatment Plant Upgrade Project. This wetland, though not found on the Army Corps of Engineer's Wetlands Map 1995, will require mitigation if it is destroyed during construction. The area of the wetland that will be impacted by construction of the proposed Effluent Tank is approximately 1,000 square feet.

A mitigation wetland can be built adjacent to the wetland to be destroyed by construction. The terrain will lend itself well to enlargement of an existing wetland in the main stream channel, just downhill from the excavation location (see attached sketch). Water from the seep now feeding the wetland to be impacted by construction will require rerouting around the Effluent Tank. This water, along with water from planned footer drains around the Influent Tank, and surface water diverted from parking areas can be used to supplement the water in the main channel that will feed the mitigation wetland.

Due to the need for this project to proceed as quickly as possible to comply with a long-standing Federal Facilities Compliance Agreement (FFCA) between DOE, RFFO and the Environmental Protection Agency (EPA), we recommend that a mitigation strategy be presented to the EPA for approval as soon as possible. In discussions with the project engineers, we have determined that mitigation at the site, immediately adjacent to the Effluent Tank location is a practical possibility. We believe this option would be acceptable to the EPA. We suggest inviting the appropriate EPA personnel out to RFETS for a site visit to discuss the project. We need the EPA to confirm its classification of the wetland as a jurisdictional wetland and determine whether EPA or the Army Corps of Engineers has jurisdiction. Once these determinations are made, the proposed mitigation strategy should be discussed with the EPA representative(s). Preparation of the mitigation wetland can be carried out in advance of, or concurrently with tank construction, whichever timing is approved by the EPA. Due to the close proximity of the proposed mitigation site to the construction area, final mitigation planting would be best performed after completion of construction, however, EPA will make this determination.

We strongly recommend that the project make a final determination that no IHSSs encroach into the area proposed for the mitigation wetland. Presence of an IHSS in the area of the proposed mitigation wetland would preclude this as an acceptable location. This information must be available prior to the EPA site visit.

ADMIN RECCRD

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It is our understanding that the selection of the specific location planned for the Effluent Tank was the only practicable solution available once design review was completed. Movement of the tank unit slightly to the east would impact a larger wetland area. Locations to the east of the Sewage Treatment Plant were rejected due to the need for long waterline excavations crossing IHSSs, and/or excavation of IHSS areas for tank construction. Other locations were not practical due to topography and other constraining features.

We are working with Larry Woods, Kaiser Hill, to arrange a meeting between the appropriate project personnel and the EPA to facilitate development of a mitigation agreement for this project.

Should you have comments or questions, please feel free to contact me at extension 3560.

MBM mbm

Attachment
As Stated

cc
C S Evans
J D Krause
L E Woods (KH)
File
ERPD Records File (2)

Attachment 1
K.R. Koebel
August 23, 1995

